

United States Bankruptcy Court
Eastern District of Michigan

In re Tamara Lynn Stokes

Case No. 13-41341

In re William Harvey Stokes

Chapter 7

Corrected Ex Parte Motion to Vacate Dismissal and Reinstate the Case

Now comes Kathleen Brown, attorney for Tamara Stokes and William Harvey Stokes, and respectfully moves this Honorable Court to vacate the dismissal of the case and to reinstate it. In support of her motion, she states as follows;

1. This is the first skeletal petition Counsel has filed with the Court.
2. Counsel read an early docket entry stating a deadline of 2/8/2013 and mistakenly believed that all the filings were due on that day.
3. Counsel has appeared in Court in her own divorce case of Ronald Kevin Torrella versus Kathleen Brown Torrella in Washtenaw County on January 24, 2013 at a Friend of the Court hearing and January 29, 2013 in Judge Connors' Courtroom. The end of the 25-year marriage has included very stressful disputes involving child custody, child support, alimony and credit card debt.
4. As such, Counsel has been distracted and not reading all her emails in as timely a matter as she normally would.
5. Counsel attempted to get partially caught up on email today, February 6, 2013, whereupon she learned that the case has been dismissed.
6. Counsel is working to rectify the situation in a timely manner.
7. The Stokes face seizure of their material possessions by the Sheriff and would face hardship if the proceedings were not allowed to go forth toward bankruptcy.

Wherefore, Counsel prays for the relief requested, that of vacating the dismissal and reinstating the case.

Respectfully submitted by:

/s/ Kathleen Brown Dated: 2/8/2013

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